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Filing date: **12/14/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91216824
Party	Defendant The Buckingham Research Group, Incorporated
Correspondence Address	MEREDITH D PIKSER REED SMITH LLP 599 LEXINGTON AVE FL 26 NEW YORK, NY 10022-7684 UNITED STATES mpikser@reedsmith.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Meredith D. Pikser
Filer's e-mail	mpikser@reedsmith.com, arkadia.olson@huschblackwell.com
Signature	/Meredith D. Pikser/
Date	12/14/2015
Attachments	Buckingham Request to Extend with Status Update.pdf(95381 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Serial Nos. 86005534, 86005612, 86005628, and 86005577

Marks: BUCKINGHAM RESEARCH GROUP

BUCKINGHAM CAPITAL MANAGEMENT

BCM BUCKINGHAM CAPITAL MANAGEMENT & Design

BRG THE BUCKINGHAM RESEARCH GROUP & Design

Published: December 3, 2013, December 10, 2013, December 17, 2013 and December 24, 2013

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Buckingham Asset Management, LLC

Opposer,

v.

The Buckingham Research Group, Incorporated :

Applicant.
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: Opposition No. 91216824
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JOINT MOTION TO EXTEND DATES

Opposer Buckingham Asset Management, LLC (“Opposer”) and Applicant The Buckingham Research Group, Incorporated (“Applicant”), through their designated counsel, jointly move for a 90 day extension of all dates in this proceeding pursuant to TBMP 509.01(a). Pursuant to the Board’s Order of September 11, 2015, the parties hereby submit this progress report demonstrating good cause for the extension.

Both parties have dealt with and/or are dealing with internal business or personnel changes since the commencement of the opposition proceeding, but are equally dedicated to trying to resolve the issues in this opposition proceeding amicably. As such, the parties request a 90 day extension of all dates so that the parties and the Board can avoid dedicating further time and resources to this opposition unless and until it becomes clear that such expense is necessary to resolve the issues.

The parties believe that their ongoing settlement discussions justify a 90 day extension. Specifically, on July 17, 2014, Applicant's counsel communicated a settlement proposal to Opposer's via email. Counsel for the parties have since discussed and negotiated Opposer's settlement proposal via telephone on September 16, 2014, October 15, 2014, November 12, 2014, November 25, 2014, April 10, 2015, and September 10, 2015; and via email on July 18, 2014, July 21, 2014, February 3, 2015, March 11, 2015, March 23, 2015, May 15, 2015, June 25, 2015, July 7, 2015, July 15, 2015, July 16, 2015, December 11, 2015, and the parties are in the process of separately working on additional possible settlement terms to address their respective concerns.¹ A draft settlement agreement has been sent to Applicant by Applicant's counsel for review; with the intent to send the draft of said settlement agreement to Opposer's counsel shortly.

The Defendant's Time to Answer is currently set to close on 12/14/2015. The parties request that such date be extended until 03/13/2016, and that all subsequent dates be reset accordingly:

Time to Answer :	03/13/2016
Deadline for Discovery Conference :	04/12/2016
Discovery Opens :	04/12/2016
Initial Disclosures Due :	05/12/2016
Expert Disclosure Due :	09/09/2016
Discovery Closes :	10/09/2016
Plaintiff's Pretrial Disclosures :	11/23/2016
Plaintiff's 30-day Trial Period Ends :	01/07/2017
Defendant's Pretrial Disclosures :	01/22/2017
Defendant's 30-day Trial Period Ends :	03/08/2017
Plaintiff's Rebuttal Disclosures :	03/23/2017
Plaintiff's 15-day Rebuttal Period Ends :	04/22/2017

¹ The parties would be happy to make themselves available for a teleconference to discuss these issues in further detail if the Board wishes for more detail.

WHEREFORE, cause having been shown, the parties respectfully request that their joint motion be granted.

Dated: December 14, 2015

Respectfully submitted,

/s/Meredith D. Pikser/
Meredith D. Pikser
Reed Smith LLP
599 Lexington Avenue
New York, NY 10022
Tel: 212 521 5432
Fax: 212 521 5450
mpikser@reedsmith.com

Attorneys for Applicant

/s/Arkadia Delay Olson
Arkadia Delay Olson
Husch Blackwell LLP
190 Carondelet Plaza, Suite 600
St. Louis, MO 63108
Tel: 314 480 1500
Fax: 314 480 1505
Arkadia.Olson@huschblackwell.com

Attorneys for Opposer